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HONGHUI CHEN

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 CHINA CENTRAL TELEVISION, a China
13 company; CHINA INTERNATIONAL
14 COMMUNICATIONS CO., LTD., a China
15 company; TVB HOLDINGS (USA), INC., a
16 California corporation; and DISH NETWORK
17 L.L.C., a Colorado limited liability company,
18 Plaintiffs,

19 vs.

20 CREATE NEW TECHNOLOGY (HK)
21 LIMITED, a Hong Kong company; et al.,
22 Defendants.

No. 2:15-cv-01869-MMM-AJW

ANSWER

23 **Come now, Defendant HongHui Chen (“Defendant”), and for his Answer, states**
24 **as follows:**

- 25 1. Defendant admits that Plaintiffs made allegations of copyright and trademark
26 infringement. Defendant does not have sufficient information to admit or deny
27 Plaintiff’s other allegations, and, on that basis, denied.
28

Answer

- 1 2. Defendant does not have sufficient information to admit or deny Plaintiff's
- 2 allegations, and, on that basis, denied.
- 3 3. Defendant does not have sufficient information to admit or deny Plaintiff's
- 4 allegations, and, on that basis, denied.
- 5 4. Defendant does not have sufficient information to admit or deny Plaintiff's
- 6 allegations, and, on that basis, denied.
- 7 5. Defendant does not have sufficient information to admit or deny Plaintiff's
- 8 allegations, and, on that basis, denied.
- 9 6. Defendant does not have sufficient information to admit or deny Plaintiff's
- 10 allegations, and, on that basis, denied.
- 11 7. Defendant does not have sufficient information to admit or deny Plaintiff's
- 12 allegations, and, on that basis, denied.
- 13 8. Defendant does not have sufficient information to admit or deny Plaintiff's
- 14 allegations, and, on that basis, denied.
- 15 9. Defendant does not have sufficient information to admit or deny Plaintiff's
- 16 allegations, and, on that basis, denied.
- 17 10. Defendant does not have sufficient information to admit or deny Plaintiff's
- 18 allegations, and, on that basis, denied.
- 19 11. Defendant does not have sufficient information to admit or deny Plaintiff's
- 20 allegations, and, on that basis, denied.
- 21 12. Defendant does not have sufficient information to admit or deny Plaintiff's
- 22 allegations, and, on that basis, denied.
- 23 13. Defendant is a re-seller of a certain TV Pad product and does not have sufficient
- 24 information to admit or deny the allegations of whether there is an "international
- 25 distribution network for the TPad Retransmission Service", as alleged and
- 26 defined by Plaintiffs. Defendant does not have sufficient information to admit or
- 27 deny Plaintiff's other allegations, and, on that basis, denied.
- 28

Answer

- 1 14. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.
- 3 15. Defendant believes Plaintiff CCTV to be a state-owned company. Defendant is
4 generally aware of CCTV's programming content having been distributed to the
5 Chinese people, both in China and overseas Chinese people, free of charge,
6 historically. Defendant does not have sufficient information to admit or deny
7 Plaintiff's other allegations, and, on that basis, denied.
- 8 16. Defendant does not have sufficient information to admit or deny Plaintiff's
9 allegations, and, on that basis, denied.
- 10 17. Defendant does not have sufficient information to admit or deny Plaintiff's
11 allegations, and, on that basis, denied.
- 12 18. Defendant does not have sufficient information to admit or deny Plaintiff's
13 allegations, and, on that basis, denied.
- 14 19. Defendant does not have sufficient information to admit or deny Plaintiff's
15 allegations, and, on that basis, denied.
- 16 20. Defendant does not have sufficient information to admit or deny Plaintiff's
17 allegations, and, on that basis, denied.
- 18 21. Defendant does not have sufficient information to admit or deny Plaintiff's
19 allegations, and, on that basis, denied.
- 20 22. Defendant does not have sufficient information to admit or deny Plaintiff's
21 allegations, and, on that basis, denied.
- 22 23. Defendant does not have sufficient information to admit or deny Plaintiff's
23 allegations, and, on that basis, denied.
- 24 24. Defendant does not have sufficient information to admit or deny Plaintiff's
25 allegations, and, on that basis, denied.
- 26 25. Defendant does not have sufficient information to admit or deny Plaintiff's
27 allegations, and, on that basis, denied.
- 28

Answer

- 1 26. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.
- 3 27. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.
- 5 28. Admit.
- 6 29. Defendant does not have sufficient information to admit or deny Plaintiff's
7 allegations, and, on that basis, denied.
- 8 30. Defendant does not have sufficient information to admit or deny Plaintiff's
9 allegations, and, on that basis, denied.
- 10 31. Defendant does not have sufficient information to admit or deny Plaintiff's
11 allegations, and, on that basis, denied.
- 12 32. Defendant does not have sufficient information to admit or deny Plaintiff's
13 allegations, and, on that basis, denied.
- 14 33. Defendant does not have sufficient information to admit or deny Plaintiff's
15 allegations, and, on that basis, denied.
- 16 34. Defendant does not have sufficient information to admit or deny Plaintiff's
17 allegations, and, on that basis, denied.
- 18 35. Defendant does not have sufficient information to admit or deny Plaintiff's
19 allegations, and, on that basis, denied.
- 20 36. Defendant does not have sufficient information to admit or deny Plaintiff's
21 allegations, and, on that basis, denied.
- 22 37. Admit that this Court has subject jurisdiction over the asserted claims.
- 23 38. Admit that this Court has personal jurisdiction over Defendant, denies the
24 remaining allegations for lack of sufficient information.
- 25 39. Admit the venue is proper.
- 26 40. Defendant does not have sufficient information to admit or deny Plaintiff's
27 allegations, and, on that basis, denied.
- 28

Answer

- 1 41. Defendant does not have sufficient information to admit or deny Plaintiff's
- 2 allegations, and, on that basis, denied.
- 3 42. Defendant does not have sufficient information to admit or deny Plaintiff's
- 4 allegations, and, on that basis, denied.
- 5 43. Defendant does not have sufficient information to admit or deny Plaintiff's
- 6 allegations, and, on that basis, denied.
- 7 44. Defendant does not have sufficient information to admit or deny Plaintiff's
- 8 allegations, and, on that basis, denied.
- 9 45. Defendant does not have sufficient information to admit or deny Plaintiff's
- 10 allegations, and, on that basis, denied.
- 11 46. Defendant does not have sufficient information to admit or deny Plaintiff's
- 12 allegations, and, on that basis, denied.
- 13 47. Defendant does not have sufficient information to admit or deny Plaintiff's
- 14 allegations, and, on that basis, denied.
- 15 48. Defendant does not have sufficient information to admit or deny Plaintiff's
- 16 allegations, and, on that basis, denied.
- 17 49. Defendant does not have sufficient information to admit or deny Plaintiff's
- 18 allegations, and, on that basis, denied.
- 19 50. Defendant does not have sufficient information to admit or deny Plaintiff's
- 20 allegations, and, on that basis, denied.
- 21 51. Defendant does not have sufficient information to admit or deny Plaintiff's
- 22 allegations, and, on that basis, denied.
- 23 52. Defendant does not have sufficient information to admit or deny Plaintiff's
- 24 allegations, and, on that basis, denied.
- 25 53. Defendant does not have sufficient information to admit or deny Plaintiff's
- 26 allegations, and, on that basis, denied.
- 27 54. Defendant does not have sufficient information to admit or deny Plaintiff's
- 28 allegations, and, on that basis, denied.

Answer

1 55. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 56. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 57. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 58. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 59. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 60. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 61. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 62. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 63. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 64. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 65. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 66. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 67. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 68. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 69. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 70. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 71. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 72. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 73. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 74. Defendant does not know if CNT manufactures the TVpad device. Defendant
12 does not have sufficient information to admit or deny Plaintiff's other
13 allegations, and, on that basis, denied.

14 75. Defendant does not have sufficient information to admit or deny Plaintiff's
15 allegations, and, on that basis, denied.

16 76. Defendant does not have sufficient information to admit or deny Plaintiff's
17 allegations, and, on that basis, denied.

18 77. Defendant does not have sufficient information to admit or deny Plaintiff's
19 allegations, and, on that basis, denied.

20 78. Defendant does not have sufficient information to admit or deny Plaintiff's
21 allegations, and, on that basis, denied.

22 79. Defendant does not have sufficient information to admit or deny Plaintiff's
23 allegations, and, on that basis, denied.

24 80. Defendant does not have sufficient information to admit or deny Plaintiff's
25 allegations, and, on that basis, denied.

26 81. Defendant does not have sufficient information to admit or deny Plaintiff's
27 allegations, and, on that basis, denied.
28

Answer

1 82. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 83. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 84. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 85. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 86. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 87. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 88. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 89. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 90. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 91. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 92. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 93. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 94. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 95. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 96. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 97. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 98. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 99. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 100. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 101. Defendant admits that the TVpad is a set-top box used for delivering video
12 content over the internet. Defendant is not aware of any issues related to
13 "authorized license" and on that basis, denied the allegation.

14 102. Defendant does not have sufficient information to admit or deny Plaintiff's
15 allegations, and, on that basis, denied.

16 103. Defendant does not know if CNT manufactured the TVpad3. Defendant does not
17 have sufficient information to admit or deny Plaintiff's other allegations, and, on
18 that basis, denied.

19 104. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 105. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 106. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 107. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 108. On information and believe, Defendant believes Plaintiffs' allegations herein to
28 be correct and admits to such allegations based thereon.

Answer

1 109. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 110. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 111. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 112. Defendant is not aware of any "without permission" issue, and on that basis,
8 denied.

9 113. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 114. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 115. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 116. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 117. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 118. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 119. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 120. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 121. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 122. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 123. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 124. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 125. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 126. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 127. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 128. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 129. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 130. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 131. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 132. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 133. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 134. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 135. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 136. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 137. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 138. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 139. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 140. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 141. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 142. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 143. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 144. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 145. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 146. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 147. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 148. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 149. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 150. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 151. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 152. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 153. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 154. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 155. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 156. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 157. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 158. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 159. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 160. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 161. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 162. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 163. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 164. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 165. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 166. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 167. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 168. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 169. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 170. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 171. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 172. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 173. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 174. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 175. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 176. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 177. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 178. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 179. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 180. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 181. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 182. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 183. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 184. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 185. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 186. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 187. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 188. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 189. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 190. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 191. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 192. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 193. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 194. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 195. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 196. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 197. Admit.

10 198. Admit.

11 199. Admit.

12 200. Defendant does not have sufficient information to admit or deny Plaintiff's
13 allegations, and, on that basis, denied.

14 201. Defendant is not aware of any issue related to "authorized " to use CCTV Marks
15 or the TVB Marks in commerce, and based thereon, denied.

16 202. Defendant denied he provided assistance for the "infringing streams of
17 copyrighted television programming" as alleged, and on that basis, denied.

18 203. Defendant does not remember the exact description of an investigator along with
19 the phone conversation. Defendant does not have sufficient information to admit
20 or deny Plaintiff's allegations, and, on that basis, denied.

21 204. Defendant admit the receipt of the purchase money.

22 205. Defendant does not remember the exact description of an investigator along with
23 the phone conversation. Defendant does not have sufficient information to admit
24 or deny Plaintiff's allegations, and, on that basis, denied.

25 206. Defendant admits the mailing delivery of a TVpad4 device.

26 207. Defendant does not have sufficient information to admit or deny Plaintiff's
27 allegations, and, on that basis, denied.

28

Answer

1 208. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 209. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 210. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 211. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 212. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 213. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 214. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 215. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 216. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 217. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 218. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 219. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 220. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 221. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 222. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 223. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 224. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 225. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 226. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 227. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 228. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 229. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 230. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 231. No need to respond.

20 232. Defendant does not have sufficient information to admit or deny Plaintiff's
21 allegations, and, on that basis, denied.

22 233. Defendant does not have sufficient information to admit or deny Plaintiff's
23 allegations, and, on that basis, denied.

24 234. Defendant does not have sufficient information to admit or deny Plaintiff's
25 allegations, and, on that basis, denied.

26 235. Defendant does not have sufficient information to admit or deny Plaintiff's
27 allegations, and, on that basis, denied.
28

Answer

1 236. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 237. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 238. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 239. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 240. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 241. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 242. Defendant does not have sufficient information to admit or deny Plaintiff's
14 allegations, and, on that basis, denied.

15 243. Defendant does not have sufficient information to admit or deny Plaintiff's
16 allegations, and, on that basis, denied.

17 244. Defendant does not have sufficient information to admit or deny Plaintiff's
18 allegations, and, on that basis, denied.

19 245. No need to respond.

20 246. Defendant does not have sufficient information to admit or deny Plaintiff's
21 allegations, and, on that basis, denied.

22 247. Defendant does not have sufficient information to admit or deny Plaintiff's
23 allegations, and, on that basis, denied.

24 248. Defendant does not have sufficient information to admit or deny Plaintiff's
25 allegations, and, on that basis, denied.

26 249. Defendant does not have sufficient information to admit or deny Plaintiff's
27 allegations, and, on that basis, denied.
28

Answer

1 250. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 251. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 252. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 253. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 254. Defendant does not have sufficient information to admit or deny Plaintiff's
10 allegations, and, on that basis, denied.

11 255. Defendant does not have sufficient information to admit or deny Plaintiff's
12 allegations, and, on that basis, denied.

13 256. No need to respond.

14 257. Defendant does not have sufficient information to admit or deny Plaintiff's
15 allegations, and, on that basis, denied.

16 258. Defendant does not have sufficient information to admit or deny Plaintiff's
17 allegations, and, on that basis, denied.

18 259. Defendant does not have sufficient information to admit or deny Plaintiff's
19 allegations, and, on that basis, denied.

20 260. Defendant does not have sufficient information to admit or deny Plaintiff's
21 allegations, and, on that basis, denied.

22 261. Defendant does not have sufficient information to admit or deny Plaintiff's
23 allegations, and, on that basis, denied.

24 262. Defendant does not have sufficient information to admit or deny Plaintiff's
25 allegations, and, on that basis, denied.

26 263. Defendant does not have sufficient information to admit or deny Plaintiff's
27 allegations, and, on that basis, denied.
28

Answer

1 264. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 265. Defendant does not have sufficient information to admit or deny Plaintiff's
4 allegations, and, on that basis, denied.

5 266. Defendant does not have sufficient information to admit or deny Plaintiff's
6 allegations, and, on that basis, denied.

7 267. Defendant does not have sufficient information to admit or deny Plaintiff's
8 allegations, and, on that basis, denied.

9 268. No need to respond.

10 269. Defendant does not have sufficient information to admit or deny Plaintiff's
11 allegations, and, on that basis, denied.

12 270. Defendant does not have sufficient information to admit or deny Plaintiff's
13 allegations, and, on that basis, denied.

14 271. Defendant does not have sufficient information to admit or deny Plaintiff's
15 allegations, and, on that basis, denied.

16 272. Defendant does not have sufficient information to admit or deny Plaintiff's
17 allegations, and, on that basis, denied.

18 273. No need to respond.

19 274. Defendant does not have sufficient information to admit or deny Plaintiff's
20 allegations, and, on that basis, denied.

21 275. Defendant does not have sufficient information to admit or deny Plaintiff's
22 allegations, and, on that basis, denied.

23 276. Defendant does not have sufficient information to admit or deny Plaintiff's
24 allegations, and, on that basis, denied.

25 277. Defendant does not have sufficient information to admit or deny Plaintiff's
26 allegations, and, on that basis, denied.

27 278. Defendant does not have sufficient information to admit or deny Plaintiff's
28 allegations, and, on that basis, denied.

Answer

1 279. Defendant does not have sufficient information to admit or deny Plaintiff's
2 allegations, and, on that basis, denied.

3 280. No need to respond.

4 281. Defendant does not have sufficient information to admit or deny Plaintiff's
5 allegations, and, on that basis, denied.

6 282. Defendant does not have sufficient information to admit or deny Plaintiff's
7 allegations, and, on that basis, denied.

8 283. Defendant does not have sufficient information to admit or deny Plaintiff's
9 allegations, and, on that basis, denied.

10 284. Defendant does not have sufficient information to admit or deny Plaintiff's
11 allegations, and, on that basis, denied.

12 285. Defendant does not have sufficient information to admit or deny Plaintiff's
13 allegations, and, on that basis, denied.

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16 **Affirmative Defenses**

17 **First Affirmative Defense**

18 Plaintiff failed to state a claim for which relief can be granted.
19

20 **Second Affirmative Defense**

21 Defendant's acts did not infringe upon Plaintiff's rightful scope of protected rights.
22

23 **Third Affirmative Defense**

24 Plaintiff's claims are barred, in whole or in part, by the doctrine of laches.
25

26 **Fourth Affirmative Defense**

27 Plaintiff's copyright claims are invalid for failure to comply with 17 U.S.C. §§101
28 et. seq.

Answer

Fifth Affirmative Defense

Plaintiff's claims are caused, in whole or in part, by third-party's independent intervening act and not attributable to Defendant's acts.

Sixth Affirmative Defense

Plaintiff's claims for relief are barred, in whole or in part, by waiver and estoppel.

Seventh Affirmative Defense

The accused acts of selling certain products that have substantial non-infringing and legitimate uses prevent a finding of liability against such acts of selling.

Eighth Affirmative Defense

Plaintiff's claims for relief are barred, in whole or in part, its lack of credible and reasonable damages basis due to the lack of recognizable causation.

Ninth Affirmative Defense

Plaintiff's claim are barred by the doctrine of unclean hands.

Tenth Affirmative Defense

Defendant has business justification for engaging in the acts accused by Plaintiff.

Eleventh Affirmative Defense

Defendant should be awarded reasonably attorney fee for defending this action if the Court finds Plaintiffs' claims against Defendant are baseless, bad-faith, frivolous or otherwise unreasonable.

Answer

Reservation of Right

Defendant reserved the rights to assert additional affirmative defenses as the case progresses and after reasonable opportunity to conduct discovery.

Dated: April 24, 2015

LT Pacific Law Group LLP

/s/Jen-Feng Lee

Jen-Feng (Jeff) Lee
Attorney for Defendant, HongHui Chen

Answer

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Rule 38 Demand For Jury Trial

Defendant demands a jury trial for all issues in this action.

Dated: April 24, 2015

LT Pacific Law Group LLP

/s/Jen-Feng Lee

Jen-Feng (Jeff) Lee
Attorney for Defendant, HongHui Chen

Answer

PROOF OF SERVICE

The undersigned certifies that the foregoing document, Answer, was filed electronically in compliance with Local Rule 5 – 3.3 and Federal Rules of Civil Procedure. As such, this document was served on all counsel deemed to have consented to electronic service. Local Rule 5 – 4.1.3. All other counsel of record or per se parties not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. Mail, as identified below:

NONE.

On this 24th day of April, 2015.

/s/Jen-Feng Lee
Jen-Feng Lee

Answer